

**IN THE DRAWINGS:**

Please replace Figure 1 with the attached replacement sheet. The replacement sheet contains an amended Figure 1 as detailed in the Remarks section, below.

### **REMARKS**

This response is intended as a full and complete response to the Office Action dated September 29, 2005. In view of the following discussion, the Applicants believe that all claims are in allowable form.

### **DRAWINGS**

Figure 1 stands objected to because of a typographical error. In response, the Applicants have amended Figure 1 to replace the term "DUEL" with the term "DUAL," as requested by the Examiner.

A replacement sheet containing the amended Figure 1 is submitted herewith. The Applicants submit that no new matter has been added by this amendment. Accordingly, the Applicants respectfully request the objection to the drawings be withdrawn.

### **SPECIFICATION**

Paragraph [0015] of the specification as filed has been amended herein to correct a typographical error. Specifically, the phrase "RF sources 104, 406" has been corrected to read "RF sources 104, 106" as properly identified in Figure 1. The Applicants submit that this amendment adds no new matter and, accordingly, respectfully request entry of this amendment.

### **CLAIM REJECTIONS**

#### **A. 35 USC §102 Claims 1, 6-8, 10 and 14-16**

Claims 1, 6-8, 10 and 14-16 stand rejected under 35 USC. §102(e) as being anticipated by U.S. Patent No. 6,642,149, issued November 4, 2003 to *Suemasa, et al.* (hereinafter *Suemasa*). In response, the Applicants have amended independent claims 1 and 10 to more clearly recite aspects of the invention.

Claims 1, 6-8, 10 and 14-16, as amended, recite limitations not taught or suggested by *Suemasa*. "Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention,

arranged as in the claim" (*Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983))). Here, *Suemasa* does not identify each of the claimed elements as arranged in the independent claims so as to establish a *prima facie* case of anticipation.

*Suemasa* teaches a plasma processing method including a process chamber having two RF power sources 122, 128, coupled through two matching devices 120, 126, to a lower electrode 106. (*Suemasa* Fig. 1 and accompanying text.) However, *Suemasa* fails to teach or suggest a first sub-circuit and a second sub-circuit wherein a first match tune space defined by the first sub-circuit can be varied without substantially affecting a second match tune space defined by the second sub-circuit, as recited in independent claims 1 and 10. Therefore, a *prima facie* case of anticipation has not been established because *Suemasa* fails to teach or suggest the limitations recited in claims 1 and 10.

Thus, independent claims 1 and 10, and claims 6-8, and 14-16 respectively depending therefrom, are patentable over *Suemasa*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

B. 35 USC §103 Claims 2-4, 9, and 11-13

Claims 2-4, 9, and 11-13 stand rejected under 35 USC §103(a) as being unpatentable over *Suemasa* in view of Japanese Patent Application Publication No 06-243992, published September 2, 1994 to *Deguchi, et al.* (hereinafter *Deguchi*). In view of the aforementioned amendments to independent claims 1 and 10, the Applicants respectfully disagree. In addition, the Applicants have amended independent claim 9 to more clearly recite aspects of the invention.

Independent claims 1 and 10, from which claims 2-4 and 11-13 respectively depend, and independent claim 9, each recite limitations not taught or suggested by any permissible combination of *Suemasa* and *Deguchi*. The teachings of *Suemasa* are discussed above. *Deguchi* teaches a plasma

processing device having a matching part 14 and an RF electric power supply part 12 in which the impedance is matched by changing an oscillation frequency of output electric power on the side of the RF electric power supply part 12. However, *Deguchi* fails to teach or suggest a first sub-circuit and a second sub-circuit wherein a first match tune space defined by the first sub-circuit can be varied without substantially affecting a second match tune space defined by the second sub-circuit, as recited in independent claims 1, 9, and 10. Accordingly, the teachings of *Deguchi* can not be used to modify the teachings of *Suemasa* in a manner that yields the limitations recited in claims 1, 9, and 10. Therefore, a *prima facie* case of obviousness has not been established because the combination of *Suemasa* and *Deguchi* fails to teach or suggest the limitations recited in claims 1, 9, and 10.

Thus, claims 2-4, 9, and 11-13 are patentable over *Suemasa* in view of *Deguchi*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

C. 35 USC §103 Claim 5

Claim 5 stands rejected under 35 USC §103 as being unpatentable over *Suemasa* in view of US Patent No. 6,887,339, issued May 3, 2005, to *Goodman, et al.* (hereinafter *Goodman*). In view of the amendment to claim 1, the Applicants respectfully disagree.

Independent claim 1, from which the above rejected claim depends, recites limitations not taught or suggested by any combination of the cited references. The teachings of *Suemasa* have been discussed above.

The Examiner cites *Goodman* to show that RF sources conventionally have a 50 Ohm output impedance. However, *Goodman* fails to teach or suggest a first sub-circuit and a second sub-circuit wherein a first match tune space defined by the first sub-circuit can be varied without substantially affecting a second match tune space defined by the second sub-circuit, as recited in independent claim 1. Accordingly, the teachings of *Goodman* can not be used to modify the teachings of *Suemasa* in a manner that yields the limitations recited in

claim 1. Therefore, a *prima facie* case of obviousness has not been established because the combination of *Suemasa* and *Goodman* fails to teach or suggest the limitations recited in claim 1.

Thus, claim 5 is patentable over *Suemasa* in view of *Goodman*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

### **NEW CLAIMS**

New claims 17-20 have been added to the application. The Applicants submit that no new matter has been added by these claims. Claims 17 and 18 respectively depend from claims 1 and 10 and are patentable at least for the reasons discussed above. Moreover, claims 17 and 18 each recite the limitation "wherein the first sub-circuit and the second sub-circuit are both configured to match the impedance of an RF signal having a frequency of between about 50 KHz and about 14.2 MHz." As none of the cited references teach or suggest such a limitation, the Applicants respectfully submit that these claims are allowable over the cited art for this reason as well.

New independent claim 19 recites a first sub-circuit for matching the impedance of a first RF signal having a frequency of between about 50 KHz and about 14.2 MHz ... and a second sub-circuit for matching the impedance of a second RF signal having a frequency of between about 50 KHz and about 14.2 MHz.... As noted above, none of the cited references teach or suggest such a limitation. Accordingly, the Applicants respectfully submit that claim 19, and claim 20 depending therefrom, are allowable over the cited art.

Thus, the Applicants submit that all new claims are patentable over any combination of the cited art. Accordingly, the Applicants respectfully request allowance of these claims.

**CONCLUSION**

Thus, the Applicants submit that all claims now pending are in condition for allowance. Accordingly, both further consideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Alan Taboada at (732) 935-7100 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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